

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

EXHIBIT 2

THOMAS BURNETT, *et al.*,

Plaintiffs,

v.

AL BARAKA INVESTMENT AND  
DEVELOPMENT CORPORATION, *et al.*

Defendants.

Civil Action No. 1:02CV01616  
Judge Robertson

DECLARATION OF SALEH ABDULLAH AL SAYKHAN,  
MANAGER OF FINANCIAL ADMINISTRATION OF THE  
INTERNATIONAL ISLAMIC RELIEF ORGANIZATION

IN THE NAME OF GOD, THE MERCIFUL, THE COMPASSIONATE, I, Saleh

Abdullah Al Saykhan, state as follows:

1. I am the Director of Financial Administration of the International Islamic Relief Organization ("IIRO"), an international charitable organization with headquarters in Jeddah, Kingdom of Saudi Arabia. I have held my current position for approximately two months. Based on that experience, I have personal knowledge of the IIRO's internal operations and charitable activities. The statements made in this declaration are based on that personal knowledge. I understand that this declaration may be submitted to an American court in connection with a lawsuit that has been filed against His Royal Highness Prince Sultan bin Abdulaziz Al-Saud ("Prince Sultan").

2. The IIRO is an Islamic charitable organization established by the World Muslim League in 1978 to provide relief and humanitarian assistance to people in need around the world. The IIRO's headquarters are located in Jeddah, Kingdom of Saudi Arabia, and it has

more than 100 offices in the Kingdom of Saudi Arabia and abroad. Through this network of offices and in cooperation with other international organizations such as the United Nations High Commission on Refugees and the International Conference of Red Cross and Red Crescent Societies, the IIRO engages in humanitarian activities in more than 120 countries. The main objective of the IIRO is to provide direct assistance to victims of natural disasters and wars. It also sponsors health, education, and social projects including the construction of hospitals, clinics, nutrition centers, schools, and orphanages. Finally, it provides financial and technical support to a wide variety of economic development efforts. In the years 2000 and 2001, the IIRO supported 2,190 separate humanitarian projects, benefiting over 10 million people worldwide. The IIRO is governed by a 15-member board of directors chaired by the Secretary General of the Muslim World League, who is nominated by the Saudi Arabian government.

3 At the request of Prince Sultan's counsel, I have conducted a review of the financial records of the IIRO to determine whether the IIRO received any financial donations from Prince Sultan during the period 1994 through September 11, 2001.

4. Based on that review, I have determined that neither the IIRO nor its affiliate Saneel el Khair received any financial donations from Prince Sultan during the above time period. Since 1987, however, the IIRO has received an annual grant of 1 million Saudi Riyals (in two semi-annual installments of SR 500,000) from the Special Committee of the Council of Ministers, which I understand to be a department of the Saudi Arabian government chaired by Prince Sultan. Copies of the 1987 letter from the Second Deputy President of the Council of Ministers announcing this grant, as well as the checks and transmittal letters that accompanied each grant are attached hereto as Exhibits A - Q. The Special Committee extended three additional grants to the IIRO in 1998, totaling 5 million Saudi Riyals, which were

specifically earmarked for the relief of flood victims in Somalia. These three grants were directed to the IIRO through the Office of the Western Command of the Saudi military, which was charged with overseeing that relief effort. Records reflecting these three grants are attached hereto as Exhibits R – T.

5. Each of the grants described above was received in Saudi Arabia.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 26th day of March, 2003G.

[signature]  
Saleh Abdullah Al Saykhan

Notary Public

We certify that Saleh Abdullah Al Saykhan appeared before us on this day, Monday, Muharram 28, 1424 H, corresponding to 31/3/2003 G and signed this declaration.

Ahmad bin Muhammad bin Abd al-Latif Al Al-Shaykh

[seal of Ministry of Justice]

[signature] [seal of notary public]